

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: STEPHEN RAYMOND ABEL : CHAPTER 13
Debtor(s) :
 :
 :
 CHARLES J. DEHART, III :
 STANDING CHAPTER 13 TRUSTEE :
 Movant :
 :
 :
 vs. :
 :
 :
 STEPHEN RAYMOND ABEL :
 Respondent(s) : CASE NO. 1-19-bk-05231

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 23rd day of January, 2020, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee provides notice to the Court as to the ineffectiveness of debtor(s) Chapter 13 Plan for the following reasons:

- a. Failure to use the Model Plan as adopted by the Court.
- b. Clarification of debtor(s) counsel fees which are in conflict with 2016(b) Statement. (2016(b))

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 29th day of January, 2020, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Tony Sangiamo, Esquire
1701 West Market Street
P.O. Box 1324
York, PA 17405

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee